

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

OLEKSIY SHARAPKA

a/k/a, Andrew Schwamkoff

a/k/a, Alexis Llanos

a/k/a, Deniss Bobrovski

Defendant.

CRIMINAL NO. 05-10004-PBS

VIOLATIONS:

18 U.S.C. § 1341 (Mail Fraud)

18 U.S.C. § 1028(a)(3) (Possession, with Intent to Use Unlawfully, Five or More False Identification Documents)

18 U.S.C. § 1029(a)(3) (Possession, with Intent to Defraud, Fifteen or More False Access Devices)

18 U.S.C. § 1029(a)(4) (Possession, with Intent to Defraud, Device-Making Equipment)

18 U.S.C. § 1028A (Aggravated Identity Theft)

18 U.S.C. § 2 (Aiding and Abetting)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

1. At all times material to this Indictment OLEKSIY SHARAPKA ("SHARAPKA") lived in and maintained one or more residences in the District of Massachusetts.

GENERAL ALLEGATIONS

2. From on or about July 16, 2004 through on or about November 5, 2004, SHARAPKA, along with others unknown to the Grand Jury, obtained the dates of birth, mothers' maiden names, addresses, social security numbers, credit cards and bank account information (collectively, "identity information") of numerous individuals ("identity theft victims").

3. SHARAPKA, along with others unknown to the Grand Jury, used the stolen credit

card numbers and identity information to purchase items over the internet and ship them to various addresses in Massachusetts.

4. SHARAPKA, along with others unknown to the Grand Jury, then sold these fraudulently purchased items.

5. SHARAPKA, along with others unknown to the Grand Jury, used the stolen bank account numbers and identity information to create bank cards which he used to withdraw and attempt to withdraw money from automatic teller machines in Massachusetts.

6. SHARAPKA, along with others unknown to the Grand Jury, used the stolen identity information to obtain, under the names of identity theft victims, mail boxes and other addresses to which he could have fraudulently purchased items mailed.

7. In total, this scheme resulted in a loss in excess of \$400,000.

COUNTS ONE THROUGH FIVE**MAIL FRAUD**

(Mail Fraud - 18 U.S.C. § 1341)

8. Paragraphs 1 through 7 are realleged and incorporated by reference as though fully set forth herein.

9. On or about the dates set forth below, in the District of Massachusetts and elsewhere, the defendant,

OLEKSIY SHARAPKA, a/k/a, Andrew Schwamkoff, a/k/a,
Alexis Llanos, a/k/a, Deniss Bobrovski,

having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, did cause to be deposited matter to be sent and delivered by a private and commercial interstate carrier and did take and receive matter from a private and commercial interstate carrier, for the purpose of executing and attempting to execute the scheme and artifice to defraud, as follows:

<u>COUNT</u>	<u>DATE</u> (on or about)	<u>MATTER MAILED</u>
1	8/24/04	Five Cybershot Digital Cameras billed to a person with the initials F.W.S. and shipped via Airborne Express to Alexis Llanos at 198 Tremont Street, in Boston, Massachusetts
2	10/18/04	A Sherling Jacket and pair of black leather boots shipped via Federal Express to a person with the initials A.D. at 8 Barrows Street, Allston, Massachusetts.
3	10/22/04	A Cannon Mini DV Camcorder and other items billed to a person with the initials W.M. and shipped via United Parcel Service ("UPS") to Alexis Llanos at 1085 Commonwealth Avenue in Boston, Massachusetts
4	11/2/04	A Photosmart 945 Digital Camera billed to a person with the initials R.B. and shipped via Federal Express to Alexis Llanos at 276 Washington Street in Boston, Massachusetts

5

11/4/04

A Sony DCRH30 Mini DV Camcorder billed to a person with the initials G.L.S. and shipped via UPS to Alexis Llanos at 276 Washington Street in Boston, Massachusetts

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT SIX

(Possession, with Intent to Use Unlawfully,
Five or More False Identification Documents - 18 U.S.C. § 1028(a)(3))

10. Paragraphs 1 through 7 are realleged and incorporated by reference as though fully set forth herein.

11. On or about November 5, 2004, in the District of Massachusetts and elsewhere, the defendant,

OLEKSIY SHARAPKA, a/k/a, Andrew Schwamkoff, a/k/a,
Alexis Llanos, a/k/a, Deniss Bobrovski,

did knowingly possess with intent to use unlawfully and transfer unlawfully, in and affecting interstate and foreign commerce, at least five false identification documents, to wit: drivers' licenses bearing the photograph of the defendant and purportedly issued in the names of other individuals.

All in violation of Title 18, United States Code, Sections 1028(a)(3) and 2.

COUNT SEVEN

(Possession, with Intent to Defraud, Fifteen or More
Unauthorized Access Devices - 18 U.S.C. § 1029(a)(3))

12. Paragraphs 1 through 7 are realleged and incorporated by reference as though fully set forth herein.

13. On or about November 5, 2004, in the District of Massachusetts and elsewhere, the defendant,

OLEKSIY SHARAPKA, a/k/a, Andrew Schwamkoff, a/k/a,
Alexis Llanos, a/k/a, Deniss Bobrovski,

did knowingly possess with intent to defraud, in and affecting interstate and foreign commerce, at least fifteen devices which were counterfeit and unauthorized access devices.

All in violation of Title 18, United States Code, Sections 1029 (a)(3) and 2.

COUNT EIGHT

(Possession, with Intent to Defraud, Device-Making
Equipment - 18 U.S.C. § 1029(a)(4))

14. Paragraphs 1 through 7 are realleged and incorporated by reference as though fully set forth herein.

15. On or about November 5, 2004, in the District of Massachusetts and elsewhere, the defendant,

OLEKSIY SHARAPKA, a/k/a, Andrew Schwamkoff, a/k/a,
Alexis Llanos, a/k/a, Deniss Bobrovski,

did knowingly possess with intent to defraud, in and affecting interstate and foreign commerce, device-making equipment, to wit: a Manual Magnetic Swipe Card Reader/Writer attached to an HP Pavillion Laptop computer.

All in violation of Title 18, United States Code, Sections 1029 (a)(4) and 2.

COUNTS NINE AND TEN

(Aggravated Identity Theft -- 18 U.S.C. Section § 1028A)

16. Paragraphs 1 through 7 are realleged and incorporated by reference as though fully set forth herein.

17. On or about November 5, 2004, in the District of Massachusetts and elsewhere, the defendant,

OLEKSIY SHARAPKA, a/k/a, Andrew Schwamkoff, a/k/a,
Alexis Llanos, a/k/a, Deniss Bobrovski,

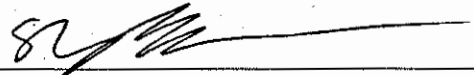
did knowingly, and with intent to defraud, transfer, possess and use, without lawful authority, means of identification of another person, to wit: the name and social security number of the individuals listed below in connection with, and with the intent to commit, and aid and abet in the commission of, one or more violations of 18 U.S.C. § 1341(Mail Fraud), 18 U.S.C. § 1028(a)(3) (Identity Document Fraud), and 18 U.S.C. 1029(a)(3) (Access Device Fraud), as follows:

<u>COUNT</u>	<u>VICTIM'S INITIALS</u>
9	A.L.
10	A.S.

All in violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL

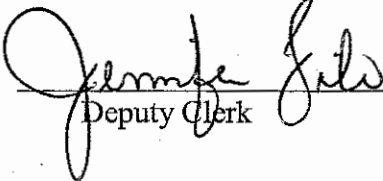

FOREPERSON OF THE GRAND JURY


Seth P. Berman
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

October 19, 2005

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk 3:05pm

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. II Investigating Agency FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Yes Case No. 05-10004-PBS
Same Defendant Yes New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
Rule 5(c)/40 from District of _____**Defendant Information:**Defendant Name Olesksy Sharapka Juvenile ☐ Yes ☒ NoAlias Name Andrew Schwamkoff, Alexis Llanos, Deniss Bobrovski

Address _____

Birth date (Year only): 1976 SSN (last 4 #): none Sex m Race: Wh Nationality: ArmenianDefense Counsel if known: Frank Fernandez Address: 4 Longfellow Place, Staniford Street
Boston, MA 02114

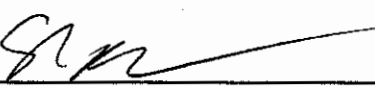
Bar Number: _____

U.S. Attorney Information:AUSA Seth Berman Bar Number if applicable 629332Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☐ Regular Process ☒ In Custody

Location Status:

Arrest Date: 12/9/2004☒ Already in Federal Custody as Pre-trial Detainee in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony Ten

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: October 19, 2005Signature of AUSA: 

JS 45 (5/97) - (Revised USAO MA 8/29/05) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Olesksy Sharapka

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. § 1341</u>	<u>Mail Fraud</u>	<u>1-5</u>
Set 2	<u>18 U.S.C. § 1028(a)(3)</u>	<u>Poss. of 5 or More False Identity Documents</u>	<u>6</u>
Set 3	<u>18 U.S.C. § 1029(a)(3)</u>	<u>Poss. of 15 or More Fraudulent Access Devices</u>	<u>7</u>
Set 4	<u>18 U.S.C. § 1029(a)(4)</u>	<u>Poss. of Device Making Equipment</u>	<u>8</u>
Set 5	<u>18 U.S.C. § 1028A</u>	<u>Aggravated Identity Theft</u>	<u>9-10</u>
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: